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June 30, 2023

**Via ECF**

Honorable Jennifer H. Rearden, U.S.D.J.  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Mahulawde v. Fashion Institute of Technology, et al.  
Docket No. 21-CV-3878 (PAE)  
Our File No. 22643.00009

Dear Honorable Judge Rearden,

My firm represents the defendants, Fashion Institute of Technology, Joseph Maiorca, Roberta Paley and Roberta Degnore, in the above referenced matter. We respectfully write, jointly with plaintiff, pursuant to Your Honor's Order dated May 22, 2023, requesting a Joint Status Letter.

To date, the parties have fully completed their fact discovery. However, defendants are still in the process of obtaining available dates for plaintiff to appear for a psychiatric IME relative to her claim of emotional distress damages – the parties are hopeful that this will take place prior to August 1, 2023. In addition, Plaintiff's counsel intends on noticing a psychiatric expert. Therefore, the parties respectfully request a 90-day extension to complete expert discovery to Monday, October 30, 2023 as additional time is needed for the completion of all necessary expert reports and depositions.

Although appreciated, defendants respectfully do not believe it would be fruitful to defer this matter to a Magistrate Judge for a settlement conference. As such, a briefing schedule is appropriate. The proposed deadlines are November 30, 2023 for a pre-motion letter, December 29, 2023 for opposition of said letter, January 29, 2024 for submission of a motion for summary judgment, February 28, 2024 for any opposition to the motion for summary judgment, and March 13, 2024 for the submission of any reply papers.

We continue to thank the Court for its time and attention in this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Nancy V. Wright".

Nancy V. Wright  
Stefanie L. Shmil

cc: Shane Seppinni (via ECF)